

Town of Livermore Falls
Livermore Falls Sewer Department
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Chapter 583 – Nutrient Criteria for Fresh Surface Waters

We have big concerns with Chapter 583 on the impact to sewer users in Livermore Falls. Once 583 is passed, and it really looks good on paper, our worst fear is that the river during very low flow conditions will still be in non-attainment due to algal blooms and low oxygen levels. The next step will be more restrictions on point sources. Any reduction in phosphorus levels at the Livermore Falls WWTF will create a real hardship to our sewer users. The 2004 Wright & Pierce study of phosphorus removal costs have our minimum expense at \$375,000. The projection in today's dollars is closer to \$700,000. (see project cost analysis enclosed)

For the last few years we have had no algal blooms in the Androscoggin River but we have also had much higher flows than average. There is no guarantee that our discharge limit for phosphorus will not be reduced because of non-attainment. The huge dollars that would have to be spent would be much better utilized to upgrade older treatment components to insure against plant failures. The State needs report compared to the State funding report is scary. We are at 1 billion dollars in needs over the next 10 years. There is now a critical deficit in ways to fund these needs. The 583s will probably only make this situation worse.

The next question is what will be gained. The truth is maybe nothing, or at best 2 algal blooms and a few hours of oxygen non-attainment. How can this be called good or even reasonable spending. We have miles of old clay tile collection system that is either filled with roots or failing structurally. Phosphorus removal would handicap our ability to properly operate our wastewater system for years.

The 583 numbers are potentially, prohibitively expensive. Please don't impose a regulation without answering the "what if" question. What if the 583s don't work? The fact is that the impoundment on the Androscoggin River (Gulf Island Dam) might never meet 100% attainment. How much expense are you willing to force on us just because we have a dam on our river??

Sincerely
Kent Mitchell, Superintendent
